# IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS **HOUSTON DIVISION**

In re:	§	Chapter 11
Seadrill Partners, LLC, et al., 1	§ §	Case No. 20-35740 (DRJ)
Reorganized Debtors.	§ §	(Jointly Administered)

### STIPULATION AND AGREED ORDER

The Reorganized Debtors and Baker & Hostetler LLP, for itself and its affiliates ("Baker & Hostetler," and collectively with the Reorganized Debtors, the "Parties") by and through their respective counsel or representatives, hereby enter into this Stipulation and Agreed Order:

WHEREAS, on May 14, 2021, the Court entered an order (the "Confirmation Order") [Docket No. 570] confirming the Fourth Amended Joint Chapter 11 Plan of Reorganization of Seadrill Partners LLC and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (as amended, modified, or supplemented, the "Plan");<sup>2</sup>

WHEREAS, on May 25, 2021, the Debtors filed the Notice of (1) Entry of Confirmation Order, (II) Occurrence of Effective Date, and (III) Related Bar Dates [Docket No. 586], which, among other things, stated that the Effective Date of the Plan had occurred on May 24, 2021;

WHEREAS, on January 12, 2021, the Court entered the Order for (1) Setting Bar Dates for Filing Proofs of Claim, Including Requests for Payment Under Section 503(b)(9), (II) Establishing Amended Schedules Bar Date and Rejection Damages Bar Date, (III) Approving the Form of and Manner for Filing Proofs of Claim, Including Section 503(b)(9) Requests, and (IV) Approving Notice of Bar Dates (the "Bar Date Order"), [Docket No. 124], establishing certain dates and deadlines for filing proofs of claims in these chapter 11 cases (collectively, the "Proofs of Claims");

WHEREAS, the Bar Date Order set February 15, 2021 as the bar date for nongovernmental entities to file proofs of claim [Docket No. 124, at 2–3];

WHEREAS, on February 15, 2021, Baker & Hostetler filed three Proofs of Claim [Claim Nos. 228, 231, and 240] asserting certain unsecured claims against the Reorganized Debtors (the "Baker & Hostetler Claims");

A complete list of each of the Reorganized Debtors in these chapter 11 cases may be obtained on the website of the Reorganized Debtors' claims and noticing agent at https://cases.primeclerk.com/seadrillpartners. The location of Reorganized Debtor Seadrill Partners LLC's principal place of business and the Reorganized Debtors' service address in these chapter 11 cases is Seadrill Partners LLC, 2nd Floor, Building 11, Chiswick Business Park, 566 Chiswick High Road, London W4 5YS, United Kingdom.

Capitalized terms used but not defined herein have the meanings given to them in the Plan.

**WHEREAS**, on November 16, 2021, the Reorganized Debtors filed *The Reorganized Debtors' First Omnibus Objection to Certain Proofs of Claim (Duplicate Claims)* [Docket No. 701] (the "*Objection*") which sought to disallow Baker & Hostetler Claim Nos. 231 and 240 on the grounds that they are duplicative of other claims;

**WHEREAS**, Baker & Hostetler's deadline to respond to the Omnibus Objection is December 17, 2021 (the "*Response Deadline*"); and

WHEREAS, the Reorganized Debtors and Baker & Hostetler have engaged in discussions regarding the Baker & Hostetler Claims and have agreed to abate the Objection as to the Baker & Hostetler Claims and the Response Deadline to allow the Parties to attempt to resolve the asserted Baker & Hostetler Claims and the Reorganized Debtors' objections thereto.

## IT IS THEREFORE STIPULATED, AGREED AND ORDERED THAT,

- 1. As to the Baker & Hostetler Claims only, the Objection is hereby abated until either the filing of a Notice (defined below) or further order of the Court.
- 2. Any and all deadlines, including the Response Deadline are hereby abated until either the filing of a Notice (defined below) or further order of the Court.
- 3. Either party may unabate the Objection as to the Baker & Hostetler Claims or the Response Deadline by filing a *Notice* with the Court (the "*Notice*").
- 4. Upon the filing of a Notice, the Parties shall request the Court set a scheduling conference not less than fourteen (14) days from the date of the filing of the Notice.
  - 5. The Parties retain all rights under the Plan and Confirmation Order.
- 6. This Stipulation and Agreed Order may be executed in identical counterparts including facsimile and/or electronic mail, each of which shall be deemed an original, but all of which together constitute one and the same instrument.
- 7. This Court shall retain jurisdiction over any and all matters arising from the interpretation or implementation of this Stipulation and Agreed Order.

Signed:	
	David R. Jones
	Chief United States Bankruptcy Judge

## STIPULATED AND AGREED TO BY:

## /s/ Simon Mayer

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## Attorneys for the Reorganized Debtors

-and-

## /s/ Andrew Layden (Signed with permission)

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